

ARDROSSAN PROGRESS ASSOCIATION INC

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Mark Howe
Mining Regulation and Rehabilitation Branch
DMITRE
GPO Box 1264
Adelaide SA 5001
email: dmitre.miningregrehab@sa.gov.au

Dear Mr Howe,

Re: Submission about the Mining Lease Proposal for the Hillside Copper Mine proposed by Rex Minerals.

On behalf of Ardrossan Progress Association I make the following submission about the Mining Lease Proposal (MLP) for the Hillside Copper Mine proposed by Rex Minerals near Ardrossan on the Yorke Peninsula.

Ardrossan Progress Association has been represented on the Hillside Community Consultative Group since its inception, both directly through our appointed representative, as well as three other members of our Association, who represent other sectors such as Local Government, Small Business and Tourism. We have each volunteered our time over the past two years to work with the proponent to maximise any benefits the proposed project will bring to the community, and minimise any negative impact. Our members have been kept informed throughout this process through regular reports at our monthly meetings.

There is no doubt the proposed project will deliver significant economic benefit to the local and state economies, through direct & indirect jobs, infrastructure improvements and community programs. Some regional benefits have already been identified, such as the increased water pipeline capacity and the upgrade to the electrical infrastructure, both of which are very positive. These benefits will however, come at a considerable cost to the local community. Our Association's position has always been, if there is to be a mine, there must be significant, tangible and direct benefits to our local community that last long after the mine has ceased operating. In short, our community requires the benefits of the proposed mine to far outweigh the cost - the MLP does not show this.

The MLP does show that 3,000 hectares of premium cropping land will be impacted, and whilst it is stated that some 70% will be returned to "agricultural pursuits" a very large portion of this will not be suitable for cropping. Numerous farming families are being displaced from land that, in many cases, was cleared by their forefathers, ending generations of continuous ownership. We understand there will be significant economic benefit for the State during the 15 year life of the mine, but we would like to see independent modelling conducted that looks at the long term loss of farming income after the mine is finished. (eg look at a 30 year period for instance - do the economics still add up?)

The impact on our environment will be significant, with noise, dust, light and vibration topping the list of community concerns. Some level of comfort has come from the knowledge that

compliance in these areas is heavily regulated, and enshrined in the conditions imposed on the operations of any mine. That comfort has diminished in recent times with the realisation that the government departments responsible for the monitoring of this compliance are severely under resourced. We understand there will be "real time" data readily available, however without someone other than the proponent monitoring that data, compliance will be self regulating. The community is concerned that it will become the "watchdog" rather than the licensing bodies.

The impact on our social infrastructure will also be significant, and unfortunately, this area is not addressed during the assessment of the MLP. Health, Education, Childcare and Emergency Services are just some of the areas of concern, and whilst the Community Consultative Group have listed these as part of the Issues Register, meaningful responses are lacking, as there is no requirement by the licensing body to address these issues.

Throughout the life of the CCG, the process has been that any issues raised are recorded in the Issues Register, which outlined the concern, the community's expectation & Rex's response on how the issue would be addressed. A very large number of these issues remain unresolved, where the CCG, and therefore the Community, are not satisfied with the recorded response. A very large number of issues are addressed by indicating suitable management plans will be in place - we have yet to see any such Management Plans.

The public consultation process for this mining lease proposal has been flawed and unprofessional. The actual document including appendices is some 2,000 pages. There are numerous contradictions within the document, with some reports that use modelling based on an outdated mine footprint. The MLP is hard to follow & cross reference, talks about different mine footprints, and uses data sources that are outdated. There were differences between the printed & electronic copies of the MLP that were issued for comment, with the revised documents only being delivered to our Association on Thursday 24th October 2013 - giving us little more than two weeks to revise. Rex have been working for nearly two years to produce the document - The community has 8 weeks in which to digest 2,000 pages, and make an informed submission.

Given all of the above, Ardrossan Progress Association is not in a position to either support or oppose the proposed Hillside mining project. There are still too many unanswered questions, nor are there any Management Plans in place to address many of the issues raised during the community consultation process.

I ask, on behalf of Ardrossan Progress Association, that we be sent reports of the findings from DMITRE's public consultation and supplementary process so we can understand the issues that were addressed

Yours faithfully,



JOHN SANDERCOCK

Chairman, Ardrossan Progress Association

7th November 2013